

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

KEVIN TRUDEAU,

Defendant.

CASE NO. 03-C-3904

Hon. Matthew F. Kennelly

**KEVIN TRUDEAU'S MOTION TO VACATE THE BAR ON THE ABILITY OF
TRUDEAU CONSULTING TRAINING AND COACHING, LLC TO
RETAIN AND DISPOSE OF OR DISSIPATE FUNDS OR ASSETS**

Kevin Trudeau and Trudeau Consulting Training and Coaching, LLC (“TCTC”) respectfully move this Court pursuant to its two Orders of September 13, 2024, to vacate its “presumably temporary bar” on the ability of TCTC to retain and dispose of or dissipate “any funds or other assets.” *See* ECF 1381 at 16, 33; ECF 1382. Retaining and spending money on operations is vital to a business’s survival. To that end, this Court recognized that TCTC and Trudeau’s other businesses “should be permitted to retain a reasonable amount of money . . . in anticipation of reasonable and legitimate operating expenses” so that they can “pay their employees . . . pay their trade creditors in a timely fashion” and otherwise conduct business that will also generate consumer redress. ECF 1381 at 33.

As set forth in Trudeau’s most recent bi-monthly report filed with this Court on August 21, 2024, TCTC incurred approximately \$372,000 in operating expenses. August 21, 2024 Report at 1141. TCTC’s expected operating expenses for the next thirty days are listed in Exhibit A hereto, which is a compilation prepared by TCTC’s accounting staff. *See* Ex. A. TCTC’s expected

ordinary operating expenses over the next thirty days total approximately \$83,083.45. *Id.* These expenses include payroll (five employees), contractors, and trade creditors.

TCTC's accounting staff also estimate that in the coming twelve months TCTC will incur additional ordinary operating expenses of over \$177,000 to fulfill orders for seminars and programming already paid for by TCTC customers. *Id.* The expenses compiled in Exhibit A are representative ongoing ordinary business expenses. TCTC customers often prepay for future programs and services. TCTC cannot guarantee that future revenue streams will be adequate to cover existing liabilities. That is why TCTC strives to maintain adequate cash reserves at all times.

For all the foregoing reasons, Trudeau and TCTC request that the Court (a) vacate its bar on TCTC's ability to dispose of or dissipate any funds or other assets; (b) permit TCTC to retain adequate cash reserves for its ordinary operating expenses and future liabilities; and (c) grant any further relief that this Court deems proper.

Dated: September 16, 2024

Respectfully submitted,

By: /s/ Giel Stein

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CERTIFICATE OF SERVICE

I, Christine Pfeiffer, a non-attorney, certify that I served the foregoing KEVIN TRUDEAU'S MOTION TO VACATE THE BAR ON THE ABILITY OF TRUDEAU CONSULTING TRAINING AND COACHING, LLC TO RETAIN AND DISPOSE OF OR DISSIPATE ANY FUNDS OR ASSETS on all parties of record via the Court's CM/ECF filing system on September 16, 2024.

/s/ Christine Pfeiffer
Christine Pfeiffer

Exhibit A

BILLS DUE NEXT 30-DAYS (Recurring monthly)

Date	To Who	Amount	Description
1st		\$ 4,364.80	Medical and Dental Insurance
2nd		\$ 520.00	Staff recruitment services
4th		\$ 200.00	Fee to process payroll
5th		\$ 187.66	Business Insurance
5th		\$ 575.00	Electric services for office
5th		\$ 56.45	Workmans Comp Insurance
5th		\$ 14.99	Graphic design platform
5th		\$ 75.00	This company provides performance improvement data
5th		\$ 150.54	Company email service
5th		\$ 8.99	Labor laws and safety regulations subscription
6th		\$ 68.80	Microsoft office subscription for staff
9th		\$ 18.95	Membership fee
9th		\$ 190.00	Creative content production platform
9th		\$ 29.99	Stock video and templates
9th		\$ 39.00	Digital assets and tools
9th		\$ 20.00	Multi-platform live streaming service
9th		\$ 120.00	Vision Insurance for employees
10th		\$ 215.80	Engage audience through texting
11th		\$ 12.00	Interactive feedback and engagement
12th		\$ 65.00	Accounting software
12th		\$ 65.00	Accounting software
12th		\$ 13.99	Television streaming service
13th		\$ 10.00	Audio advertising made simple
13th		\$ 19,565.39	Payroll for employees
13th		\$ 7,512.50	Payroll tax
13th		\$ 504.00	Staff recruitment services
15th		\$ 70.00	Royalty-free video assets
15th		\$ 45.00	Video review and collaboration
16th		\$ 500.15	Staff recruitment services
16th		\$ 99.00	Podcast hosting and analytics
16th		\$ 1,540.95	Internet service for office
16th		\$ 1,500.00	Kevin Trudeau Show Editor
20th		\$ 520.00	Office cleaning services
20th		\$ 382.45	Creative software and tools
22nd		\$ 656.26	Internet service for office
22nd		\$ 87.90	Advanced AI translation service
25th		\$ 19,565.39	Payroll for employees
25th		\$ 7,512.50	Payroll tax
31st		\$ 1,500.00	Kevin Trudeau Show Editor
31st		\$ 600.00	Kevin Trudeau Show Editor
		\$ 2,500.00	Advertisement and Marketing
		\$ 2,200.00	Video advertising for engagement
		\$ 2,200.00	Audio advertising
		\$ 3,000.00	Video platform for creators
		\$ 3,500.00	Office supplies
		\$ 200.00	Shipping services
		\$ 150.00	Global shipping and logistics
		\$ 150.00	Express shipping and logistics
Total		\$ 83,083.45	

Product Fulfillment Next 12 Months

Money Process & Relationship Process Seminars	Flight/Hotel, Facilitation Payment, Meeting Rooms & Reply Dinner
Total	\$ 177,860.23